



C A G
Citizen consumer and civic Action Group

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To

March 31, 2020

Mr. C.K.Mishra
Secretary,
Ministry of Environment, Forests and Climate Change
Indira Paryavaran Bhavan,
Jor Bagh Road, New Delhi

Dear Sir,

I write to you from Citizen consumer and civic Action Group (CAG). We are a 34 year old non-profit, non-political and professional organisation working towards protecting citizens' rights in consumer, civic and environmental issues and promoting good governance processes including transparency, accountability, and participatory decision-making.

I write this regarding the Draft Environmental Impact Assessment Notification 2020, which was uploaded in the MoEFCC Website on March 12, 2020, with a view to receive public comments within 60 days. The purpose of such an effort is to elicit comments from as many people as possible, which is especially significant for a legislation as this which has far-reaching impacts.

However, the current situation is not conducive for such an effort, in light of the enormous challenges posed by the outbreak of the pandemic COVID-19. Panic has seized the country since late January, when the first positive case was reported in Kerala. On the day the draft was uploaded by the MoEFCC for public comments, India had 74 [confirmed cases](#) of COVID-19, including its first casualty, and the World Health Organisation had already declared the outbreak a pandemic. Following restrictions in place by then by several states including Kerala, Maharashtra and Tamil Nadu to contain the outbreak, the entire country entered a 21-day period of complete lockdown, two weeks later.

Very significant as a precautionary measure, 'social distancing' has led to a scramble for access to basic resources for the people. These extraordinarily hard circumstances will severely limit the ability of the public to access, analyse and share their comments on the Notification. Civil Society Organisations and the media, who are key stakeholders in the public consultation for any proposed legislation, are also occupied with the challenges posed by the public health crisis.

Trustees

Mr. Sriram Panchu (Senior Advocate)

Dr. R. Hema (Associate Professor)

Dr. Suchitra Ramkumar (Doctor and Teacher)

Dr. George Thomas (Orthopedic Surgeon)

Dr. C Rammanohar Reddy (Economist and Editor)

Mr. Kesav Desiraju (IAS Retd.)

Advisors

Ms. Tara Murali (Architect)

Mr. NL Rajah (Senior Advocate)



Acknowledging the challenges of these times, the MoEFCC has already [extended](#) the validity of Environmental Clearances of all projects that were to expire between March 15- April 30, to June 30, 2020. In the same vein, we request that the draft be withdrawn from public domain and put out for public comments once normalcy resumes, and when all stakeholders can afford the required time, access and resources to respond effectively to this Notification.

Sincerely

Om Prakash Singh
Executive Director